

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

**Jeffrey David Corbett,¹ and
Helen Christine Corbett.**

Case No. 19-36309

Chapter 11

Judge Huennekens

**NOTICE OF (A) FILING OF APPLICATION TO EMPLOY AND (B) HEARING
ON MOTION IF NECESSARY (ONLY TO BE HELD IF OBJECTION TIMELY FILED)**

PLEASE TAKE NOTICE that the above captioned debtors and debtors-in-possession (the “**Debtors**”), by counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) an *Application to Retain and Employ Kutak Rock, LLP as Their Special Counsel* (the “**Application**”). A copy of the Application is being served upon you simultaneously herewith.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 9013-1, unless a written response to the Application is filed with the Clerk of Court and served on the moving party no later than April 30, 2020, the Court may deem any opposition waived, treat the Application as conceded, and issue an order granting the relief requested.

If you do not want the Court to grant the relief sought in the Application, or if you want the Court to consider your views on the Application, then no later than April 30, 2020 you or your attorney must:

1. File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1. You must send or otherwise

¹ The Debtors’ principal place of business as of the petition date is 221 Roslyn Hills Drive, Henrico, Virginia 23229, and the last four digits of the Debtors’ Social-Security Numbers are -4102 and -6140.

Lynn L. Tavenner, Esquire (Va. Bar No. 30083)
Paula S. Beran, Esquire (Va. Bar No. 34679)
David N. Tabakin, Esquire (Va. Bar No. 82709)
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

Counsel for the Debtors

file it early enough so the Court will receive it on or before the due date identified herein.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

2. You must also serve a copy on:

Paula S. Beran, Esquire
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219

3. If you object to the Application, you must file the Objection timely and attend a hearing to be held on May 13, 2020, at 12:30 PM before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219.

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Application as conceded, and issue an order granting the requested relief without further notice or hearing.

Respectfully submitted,

Dated: April 16, 2020

By: /s/ Paula S. Beran
Lynn L. Tavenner, Esquire (VSB No. 30083)
ltavenner@tb-lawfirm.com
Paula S. Beran, Esquire (VSB No. 34679)
pberan@tb-lawfirm.com
David N. Tabakin, Esquire (VSB No. 82709)
dtabakin@tb-lawfirm.com
Tavenner & Beran, PLC
20 North 8th Street
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopier: (804) 783-0178

Counsel for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April 2020, a copy of the foregoing Notice was mailed by U.S. Mail, postage prepaid, or electronic mail to was served via first-class mail and/or electronic delivery to the Debtors' twenty largest unsecured creditors as identified in their chapter 11 petition, the Debtors' known secured creditors, any known legal counsel for the Debtors' secured creditors, the Subchapter V Trustee, and the Office of the United States Trustee ((as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran
Counsel

SCHEDULE A

M. Christine Maggard
Bock and Scott, PLLC
8757 Red Oak Blvd., Suite 150
Charlotte, NC 28217
christine.maggard@brockandscott.com*

Dawn Ann Morville Johnson
Greensfelder, Hemker & Gale, P.C.
10 South Broadway
Saint Louis, MO 63102-1747
dmj@greensfelder.com*

MAP Ground Lease Owner LLC
c/o Dana S. Plon, Esquire
Sirlin Lesser & Benson, P.C.
Philadelphia, PA 19109-1042
dplon@sirlinlaw.com*

Auto Driveaway Franchise Systems, LLC
c/o David R. Ruby, Esq.
ThompsonMcMullan, P.C.
Richmond, VA 23219
druby@t-mlaw.com;
wprince@t-mlaw.com*

David J. Simmons
Greensfelder, Hemker & Gale, P.C.
10 South Broadway
Saint Louis, MO 63102-1747
ds@greensfelder.com*

Elizabeth Ann Austermuehle
Greensfelder, Hemker & Gale, P.C.
200 West Madison
Chicago, IL 60606-3607
eaustermuehle@greensfelder.com*

Atlantic Union Bank
c/o Jeremy S. Williams, Esq.
Kutak Rock LLP
Richmond, VA 23219-4071
jeremy.williams@kutakrock.com;
brian.richardson@kutakrock.com*

Kara Eve Foster Cenar
Greensfelder, Hemker & Gale, P.C.
200 West Madison
Chicago, IL 60606-3607
kcenar@greensfelder.com*

Susan Meyer
Greensfelder, Hemker & Gale, P.C.
200 West Madison
Chicago, IL 60606-3607
smeyer@greensfelder.com*

Thadford A. Felton
Greensfelder, Hemker & Gale, P.C.
200 West Madison
Chicago, IL 60606-3607
taf@greensfelder.com*

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849
USTPRegion04.RH.ECF@usdoj.gov*

AllData
PO Box 848379
Dallas, TX 75284-8379

Auto Driveaway Richmond LLC
221 Roslyn Hills Drive
Henrico, VA 23229-7441*

BB&T Corporation
c/o Kelly S. King, Chairman and CEO
200 West Second Street
Winston Salem, NC 27101-4049

Capital One Bank (USA), N.A.
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901
POC_AIS@americaninfosource.com*

Capital One Bank USA NA
c/o Richard D. Fairbank, CEO/President
1680 Capital One Drive
Mc Lean, VA 22102-3407
POC_AIS@americaninfosource.com*

CarMax, Inc.
c/o William D. Nash, CEO
12800 Tuckahoe Creek Parkway
Henrico, VA 23238-1124

Chase
P.O. Box 15123
Wilmington, DE 19850-5123

Citibank North America
c/o Michael Corbat, CEO
388 Greenwich Street
New York, NY 10013-2362

Frank A. Wood, Jr.
c/o Alexander N. Simon, Esq.
2604 W. Main Street
Richmond, VA 23220-4313
asimonatty@aol.com*

Stearns Bank National Association
c/o Jordan N. Hopkins
Bankruptcy Portfolio Manager
4191 2ND Street South
ST Cloud MN 56301-3761
Jordan.hopkins@stearnsbank.com*

JPMorganChase Bank
700 Kansas lane
Monroe, LA 71203-4774

Kathryn Corbett
2510 Cox Road
Henrico, VA 23233-2746
rwestermann@hirschlerlaw.com

Leaf Capital Funding LLC
1720A Cree Street
Moberly, MO 65270-3681

Madison Lee Warhurst
3727 Mount Airey Lane
Annandale, VA 22003-1549

North Star Leasing Company
P.O. Box 342
Brattleboro, VT 05302-0342

O'Hagan Meyer LLC
411 East Franklin Street, Suite 500
Richmond, VA 23219-2200

Porter Realty Company Inc.
P. O. Box 6482
4801 Radford Avenue
Richmond, VA 23230-3505

South State Bank
1 Corporate Drive, Suite 360
Lake Zurich, IL 60047-8945

Southern Investment, LLC
1336 Gravatt Way
Midlothian, VA 23114-4601

Southern Investment, LLC
c/o Kane, Jeffries, & Carollo, P.C., r/a
1700 Bayberry Court # 103
Richmond, VA 23226-3791

Specialized Loan Servicing
8742 Lucent Blvd, Ste 300
Littleton, CO 80129-2386

M&T Bank
PO Box 1508
Buffalo, NY 14240
Cohara1@mtb.com*

SunTrust Bank now Truist Bank
Attn: Support Services
P.O. Box 85092
Richmond, VA 23286-0001
consumerbankruptcy@suntrust.com*

Truist Bank, SBM to SunTrust Bank
1001 Semmes Avenue
Richmond, VA 23222
Christine.maggard@brockandscott.com*

TW Franchise Holdings LLC
221 Roslyn Hills Drive
Henrico, VA 23229-7441*

US Small Business Administration
c/o Chris Pilkerton, General Counsel
409 3rd St, SW
Washington, DC 20416-0005

Verizon
PO Box 489
Newark, NJ 07101-0489
POC_AIS@americaninfosource.com*

Verizon Wireless Bankruptcy Admin.
500 Technology Drive
Suite 550
Saint Charles, MO 63304-2225
POC_AIS@americaninfosource.com*

Richard C. Maxwell
Woods Rogers PLC
10 S. Jefferson Street, Suite 1400
Roanoke, VA 24011
rmaxwell@woodsrogers.com*

Atlantic Union Bank
c/o c/o Jeremy S. Williams, Esq.
Kutak Rock LLP
901 E. Byrd St., Ste. 1000
Richmond, VA 23219
jeremy.williams@kutakrock.com*

*Entities so noted received notice via
CM/ECF and/or email